

20200 21 JAN 2018 14:48:00 MDT

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

William X Nietzsche (solely as trustee for  
KRME International Trust),

Et al.,

9<sup>th</sup> Cir. Case #: 19-35876

U.S. Dist. Case #: 3:18-CV-01930

Plaintiff/Petitioner,

PLAINTIFF'S MOTION FOR HEARING  
ON SUPERSEDEAS BOND

*Plaintiff's Motion for Hearing  
on Supersedeas Bond*

v.

FREEDOM MORTGAGE CORPORATION (FMC),

Et al.,

Defendant(s)/Respondent(s)

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PLAINTIFF'S MOTION FOR HEARING ON SUPERSEDEAS BOND

COMES NOW Plaintiffs, one of the people of this American Republic, to move this court of record to enter an order scheduling a hearing for Plaintiff's supersedeas bond filed December 16, 2019, stating in support:

1. On December 16, 2019, Plaintiff's filed a supersedeas bond securing its right on appeal in the U.S. District Court for the District of Oregon Portland Division case #3:18-cv-01930.
2. Plaintiffs seek approval of its supersedeas bond to stay the inferior state court FED action filed against Plaintiffs by Defendant Urban Housing Development LLC on November 19, 2018.

WHEREFORE, Plaintiffs move this court of record to enter an order scheduling a hearing for Plaintiff's supersedeas bond filed December 16, 2019.

I affirm the abovesaid to be true and correct under penalties of perjury.

RESPECTFULLY DATED this 2 day of January, 2020.

By JMK

Julie Ann Metcalf Kinney  
In Solo Proprio, In Proper Persona  
Sui Heredes, Sui Juris [Pro se]

By WN  
William X Nietzsche, as trustee for KRME International Trust  
In Solo Proprio, In Proper Persona,  
Sui Heredes, Sui Juris [Pro se]

RECV'D JAN 20 13:12:00PM ORP

**CERTIFICATE OF SERVICE**

I, William X Netch, certify under the penalty of perjury from without the "United States" and from within the "United States of America" a foreign sovereign pursuant 28 U.S.C. § 1746(1) and 28 U.S.C. §1605, that on January 2, 2020, I served the foregoing documents via electronic service and/or U.S postal service first-class mail:

1. PLAINTIFF'S MOTION TO RECUSE JUDGE MICHAEL SIMON DATED JANUARY 2, 2020
2. AFFIDAVIT IN SUPPORT OF PLAINTIFF'S MOTION TO RECUSE JUDGE MICHAEL SIMON DATED JANUARY 2, 2020
3. PLAINTIFF'S MOTION FOR HEARING ON SUPERSEDEAS BOND DATED JANUARY 2, 2020

BY HAND: XXX, MAIL:       , ELECTRONIC SERVICE: XXX

To: UNITED STATES DISTRICT COURT HOUSE  
Court Clerk Mary Austad  
[Mary.austad@ord.uscourts.gov](mailto:Mary.austad@ord.uscourts.gov)  
1000 SW 3<sup>rd</sup> Avenue - Portland, Oregon 97204

BY HAND:       , MAIL:       , ELECTRONIC SERVICE: XXX

To: UNITED STATES DISTRICT COURT HOUSE  
Judge Michael Simon  
[Michael.Simon@ord.uscourts.gov](mailto:Michael.Simon@ord.uscourts.gov)  
1000 SW 3<sup>rd</sup> Avenue - Portland, Oregon 97204

BY HAND:       , MAIL:       , ELECTRONIC SERVICE: XXX

To: FREEDOM HOME MORTGAGE CORPORATION  
MORTGAGE ELECTRONIC REGISTRATION SYSTEM  
Att. Nellie Barnard  
[nellie.barnard@bk1law.com](mailto:nellie.barnard@bk1law.com)  
2300 US Bancorp Tower  
111 SW Fifth Ave - Portland, Oregon 97204

BY HAND:       , MAIL:       , ELECTRONIC SERVICE: XXX

To: HSBC HOLDINGS PLC  
HSBC FINANCE CORPORATION  
HSBC HOME EQUITY LOAN CORPORATION  
BENEFICIAL OREGON INC  
BENEFICIAL FINANCIAL 1 INC  
Att. Meryl Hulteng, [hultengm@lunapowell.com](mailto:hultengm@lunapowell.com)

Att. Pilar French, Lane Powell PC  
601 SW Second Avenue, Suite 2100  
Portland, Oregon 97204

BY HAND: \_\_\_\_\_, MAIL: \_\_\_\_\_, ELECTRONIC SERVICE: XXX

**To:** MTGLQ INVESTORS, L.P.

Att. Kevin H. Kono  
[kevinkono@dwl.com](mailto:kevinkono@dwl.com)  
1300 SW 5TH Avenue, Suite 2400  
Portland, OR 97201-5610

BY HAND: \_\_\_\_\_, MAIL: \_\_\_\_\_, ELECTRONIC SERVICE: XXX

**To:** US BANK NATIONAL ASSOCIATION  
RUSHMORE LOAN MANAGEMENT SERVICES  
MORTGAGE ELECTRONIC REGISTRATION SYSTEM  
RAIN CITY CAPITAL OF OREGON LLC  
Att. Tom Purcell  
[tpurcell@imblelaw.com](mailto:tpurcell@imblelaw.com)  
117 SW Taylor Street, Suite 200  
Portland, Oregon 97204

BY HAND: \_\_\_\_\_, MAIL: \_\_\_\_\_, ELECTRONIC SERVICE: XXX

**To:** URBAN HOUSING DEVELOPMENT  
Roman Ozeruga  
Att. Terrance J. Slominski  
[tslominski@yahoo.com](mailto:tslominski@yahoo.com)  
[Yenables.sломinski.law@gmail.com](mailto:Yenables.sломinski.law@gmail.com)  
7100 SW Hampton, Suite 101  
Tigard, Oregon 97223

BY HAND: \_\_\_\_\_, MAIL: \_\_\_\_\_, ELECTRONIC SERVICE: XXX

**To:** CLEAR RECON CORPORATION  
Att. Peter Salmon  
[psalmon@aldridgeppte.com](mailto:psalmon@aldridgeppte.com)  
Steven W Pite, PRESIDENT  
4375 Jutland Drive  
San Diego, California, 92177

BY HAND: \_\_\_\_\_, MAIL: XXX, ELECTRONIC SERVICE: \_\_\_\_\_

**To:** BARRISTER SUPPORT SERVICES  
Terry Sheldon  
11349 SW 60<sup>th</sup> Avenue,  
Portland, Oregon 97219

BY HAND: \_\_\_\_\_, MAIL: XXX, ELECTRONIC SERVICE: \_\_\_\_\_

To: UNITED STATES CORPORATION COMPANY

William Barr  
950 Pennsylvania Ave, NW  
Washington D.C.20530

BY HAND: \_\_\_\_\_, MAIL: XXX, ELECTRONIC SERVICE: XXX

To: STATE OF OREGON CORPORATION

Att. Nathaniel Aggrey, AAG  
[Nathaniel.Aggrey@doj.state.or.us](mailto:Nathaniel.Aggrey@doj.state.or.us)  
1162 Court St, NE  
Salem, Oregon 97301

BY HAND: \_\_\_\_\_, MAIL: XXX, ELECTRONIC SERVICE: XXX

To: GOLDMAN SACHS GROUP INC

Att. Anthony Todaro  
[Anthony.wodarp@dlapiper.com](mailto:Anthony.wodarp@dlapiper.com)  
701 Fifth Avenue, Suite 6900  
Seattle, Washington 98104

BY HAND: \_\_\_\_\_, MAIL: XXX, ELECTRONIC SERVICE: XXX

To: Mark K. Passanante  
Terrance Slominski  
Att. Andrew Weiner  
[atw@hartwagner.com](mailto:atw@hartwagner.com)  
1000 SW Broadway, Twentieth floor  
Portland, Oregon 97205

William X. Nietzsche  
PRINT NAME

William X. Nietzsche  
SIGNATURE

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Signature made parallel to UCC 1-308, 2-211, 2-213

UCC §2-211 Legal Recognition of electronic contracts, records, and signatures; (1) A record or signature may not be denied legal effect or enforceability solely because it is in electronic form. UCC § 2-213 Electronic communication (1) If the receipt of an electronic communication has a legal effect, it has that effect even if no individual is aware of its receipt.

dated January 2, 2020